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15 \*Attorneys for Petitioner Lausteveion Johnson

16 UNITED STATES DISTRICT COURT  
17 DISTRICT OF NEVADA

18 Lausteveion Johnson,

19 Plaintiff,

20 v.

21 Regina Barrett, *et al.*,

22 Defendants.

Case No. 2:17-cv-02304-RFB-BNW

**Stipulation for Extension of Time  
to File Response to Defendant's  
Motion for Judgement  
Notwithstanding the Verdict  
Pursuant to FRCP 50(b), or  
Alternatively for a New Trial  
Under FRCP 59**

1 On April 7, 2025, Defendants filed a 30-page motion under Fed. Rule of Civ.  
2 Pro 50(b) and 59 concerning the judgment entered in this case following a trial. A  
3 response from Mr. Johnson would be due on April 21, 2025. The parties hereby  
4 stipulate that this deadline may be extended until April 28, 2025. As good cause for  
5 this stipulation, the parties state as follows.

6 Defendants' lengthy motion raises multiple issues that will likely require  
7 legal research and review of the trial record. Lead counsel for Mr. Johnson,  
8 however, is scheduled to begin a vacation beginning on April 11, 2025 and will not  
9 return to the office until April 21, 2025. Under these circumstances, it will be not  
10 be feasible for Mr. Johnson's counsel to prepare a response by the current deadline,  
11 particularly because Mr. Johnson also believes it appropriate to file a Reply to  
12 Response to his Motion concerning Costs and Fees, which Defendants filed  
13 contemporaneously with the Rule 50(b) motion. Counsel for Mr. Johnson have  
14 conferred with opposing counsel, who have courteously agreed that the deadline  
15 should be extended under these circumstances.

1 For the above reasons, the parties would respectfully stipulate there is good  
2 cause to extend the deadline for a response to Defendant's Motion for Judgement  
3 Notwithstanding the Verdict Pursuant to FRCP 50(b), or Alternatively for a New  
4 Trial Under FRCP 59 until April 28, 2025.

5  
6 Dated April 11, 2025

7  
8 Aaron D. Ford  
Attorney General

Rene L. Valladares  
Federal Public Defender

9  
10 /s/ Nathan M. Claus  
11 Nathan M. Claus  
Deputy Attorney General

/s/ Ryan Norwood  
Ryan Norwood  
Assistant Federal Public Defender

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13 **IT IS SO ORDERED.**

14 **DATED:** this 14th day of April, 2025.

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17 **RICHARD F. BOULWARE, II**  
18 **UNITED STATES DISTRICT JUDGE**  
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